

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

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|---------------------------|---|-------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | CRIMINAL NO. 15-4268 KG |
| |) | |
| vs. |) | |
| |) | |
| DANIEL SANCHEZ, |) | |
| |) | |
| Defendant. |) | |

**UNITED STATES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO DEFENDANTS' BRIEF REGARDING "PROTECTIVE ORDERS" FOR
MATERIALS OBTAINED FROM SOURCES OTHER THAN THE GOVERNMENT
(DOC. 302) AND DEFENDANT DANIEL SANCHEZ'S REPLY REGARDING COURT'S
ABILITY TO SUBJECT MATERIALS OBTAINED INDEPENDENTLY OF THE
COURT'S PROCESS TO COURT'S PROTECTIVE ORDER (DOC 315)**

The United States of America hereby files this unopposed motion to extend the time in which to respond to Defendants' Brief Regarding "Protective Orders" For Materials Obtained From Sources Other Than The Government (Doc. 302) and Defendant Daniel Sanchez's Reply Regarding Court's Ability To Subject Materials Obtained Independently Of The Court's Process To Court's Protective Order (Doc 315). The United States' response to Defendants' Brief Regarding "Protective Orders" For Materials Obtained From Sources Other Than The Government (Doc. 302) was due March 22, 2016 and Defendant Daniel Sanchez's Reply Regarding Court's Ability to Subject Materials Obtained Independently of the Court's Process to Court's Protective Order (Doc 315) is not due until March 29, 2016.

1. Additional time is needed to complete the United States' responses.
2. Defense counsel, Amy E. Jacks, does not oppose the United States' request for an extension of time within which to file its response.

3. Defense counsel, Margaret Strickland, does not oppose the United States' request for an extension of time within which to file its response.

WHEREFORE, the United States respectfully requests that the Court extend the deadline for filing of the United States' responses until Wednesday, March 30, 2016.

Respectfully Submitted,

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I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification to defense counsel of record on this date.

/s/ _____
MARIA Y. ARMIJO
Assistant United States Attorney